

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

SHABRIA “BRI” WILLIAMS

*On Behalf of Herself and All
Other Similarly Situated Individuals*

PLAINTIFF,

v.

GGC-BALTIMORE, LLC
D/B/A THE GENTLEMEN’S GOLD CLUB

DEFENDANT.

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Case No.: 1:19-cv-274

**PLAINTIFF’S MOTION FOR CONDITIONAL CERTIFICATION OF FOR NOTICE
TO POTENTIAL PLAINTIFFS AND FOR CONDITIONAL CERTIFICATION**

Plaintiff, individually and on behalf of other similarly-situated current and former exotic dancers working at Defendant’s Baltimore, Maryland Gentlemen’s Gold Club, files this Motion for Notice to Potential Plaintiffs and for Conditional Certification.

As further detailed and supported in Plaintiff’s Memorandum, Defendant uniformly misclassified its exotic dancers at its Baltimore, Maryland Gentlemen’s Gold Club exotic dance club as independent contractors and not as employees. Arising out of this misclassification, Defendant failed to pay Plaintiff and other exotic dancers any wages for hours worked. As a consequence, current and former exotic dancers that worked or work at Defendant’s Baltimore, Maryland Gentlemen’s Gold Club are entitled to unpaid FLSA minimum wage compensation that Defendant improperly failed to pay them.

WHEREFORE, for good cause shown and as further supported in Plaintiff’s Memorandum, Plaintiff requests this Honorable Court enter an Order granting the following relief:

1. That Defendant provide Plaintiff with the names, last known addresses, home and cellular phone numbers, and work and personal e-mail addresses of those individuals worked at Defendant's Baltimore, Maryland Gentlemen's Gold Club as exotic dancers at any time during the period January 2016 through the present;

2. That the Court authorize that the Notice included with Plaintiff's Motion may be immediately issued by first class mail, electronic mail, and posting to those individuals whose names are being provided;

3. That the Court authorize that the Consent included with Plaintiff's Motion may be enclosed and posted with the Notice to Potential Plaintiffs, along with a self-addressed, stamped envelope; and

4. That the potential class members shall be provided until sixty (60) days after the mailing and/or e-mailings of the Notice to file a Notice of Consent opting-in to this litigation as plaintiffs.

Respectfully submitted,

/s/ Gregg C. Greenberg
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